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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DATE: JUL 18 1994

SUBJECT: ACTION MEMORANDUM - Ceiling Increase Request for
an Time Critical Removal Action at the A.A. Waste Oil
Site in Rock Island, Illinois (Site ID# RT)

FROM : Kenneth Theisen, On-Scene Coordinator
Emergency and Enforcement Response Branch-Section III

TO: William E. Muno, Director
Waste Management Division

THRU: Jodi Traub, Acting Associate Division Director
Office of Superfund

I. PURPOSE

The purpose of this memorandum is to obtain your approval for a ceiling increase of \$35,000 to continue the time critical removal action at the A. A. Waste Oil Site in Rock Island, Illinois. The removal action consists of segregating, transporting, and treating and/or disposing of the over 250,000 gallons of waste oils, PCB's, sludge and water stored at the site. In addition, several dozen drums of lead based paints were stored on site. This increase will raise the approved project ceiling of \$602,000 to \$637,000.

This site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

The CERCLIS ID# for this site is ILD000810291.

Please refer to the attached copy of the November 30, 1992, Action Memorandum for site conditions and background.

The ceiling increase is required to complete the shipment of the last few loads of waste oils/solvents and additional work associated with soil and water sampling.

Since the start of the removal action on January 13, 1994 the following activities have been completed:

1. over 100,000 gallons of waste oil disposed
2. over 17,000 gallons of PCB oil disposed
3. 54 drums of PCB sludge disposed
4. 14 drums of flammable solid disposed
5. over 200 cu. yd. of petroleum contaminated soil disposed
6. over 1,000 cu. yd. of solidified tank sludge disposed
7. over 100,000 gallons of waste water treated and released
8. 175 tons of scrap metal recycled

The ceiling increase is needed to cover costs associated with the last several loads of waste oil sent off-site for recycling, and a greater than expected amount of PCB sludge.

The ceiling increase is also needed to cover costs associated with additional sampling.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the A. A. Waste Oil Site continue to present a threat to public health, or welfare, or to the environment and meet the criteria for the removal action as stated in the National Contingency Plan (NCP) Section 300.415 (b)(2), specifically:

- a. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

Although approximately 200 cu. yd of contaminated soil was removed and disposed of, planned soil and groundwater sampling is necessary to determine if this effort was sufficient in removing the initial threat. Pre-removal sampling indicated the presence of PCB's.

- b. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk containers that may pose a threat of release.

Over 100,000 gallons of waste oils/solvents have been disposed of thus far at the site. Several loads of this material remain on site waiting on disposal. Failure to do so will ultimately result in a release of this material, possibly to an adjacent lake.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the work remaining to address the possibly contaminated soil and groundwater, and the remaining tanker loads of oils and solvents, and the potential exposure pathways as described in the November 30, 1992 Action Memorandum, actual or threatened releases of hazardous substances from the site, if not addressed by implementing the continued response actions selected in this Action Memorandum, may present an

imminent and substantial endangerment to public health, or welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The purpose of this removal action is to continue the mitigation of the imminent threat to human health and the environment posed by the potentially contaminated soils and groundwater and by the remaining loads of solvent contaminated waste oil. In order to accomplish this, the following actions are proposed:

1. continue shipping the contaminated waste oil off-site for disposal.
2. take groundwater samples from 2 locations and soil samples from varying depths at the two locations, and perform the appropriate analytical procedures.

The detailed cleanup contractor cost estimate increase is presented in Attachment 1 and estimated project cost increases are summarized below:

EXTRAMURAL COSTS	CURRENT CEILING	INCREASE	NEW CEILING
Cleanup Contractor	\$350,000	\$25,000	\$375,000
Contingency (20%)	\$ 70,000	\$ 5,000	\$ 75,000
Subtotal	\$420,000	\$30,000	\$450,000
Total TAT, incl. multiplier	\$ 30,000	\$ 5,000	\$ 35,000
Extramural Subtotal	\$450,000	\$35,000	\$485,000
Extramural Contingency	\$ 90,000	0	\$ 90,000
Total, Extramural Costs	\$540,000	\$35,000	\$575,000
INTRAMURAL COSTS			
U.S. EPA Direct Costs	\$ 24,000	0 •	\$ 24,000
U.S. EPA Indirect Costs	\$ 38,000	0	\$ 38,000
Total Intramural Costs	\$ 62,000	0	\$ 62,000
TOTAL REMOVAL CEILING	\$602,000	\$35,000	\$637,000

It is anticipated that only a few on-site days will be required to complete the above work.

Applicable or Relevant Appropriate Requirements

All applicable or relevant and appropriate requirements (ARARs) of Federal law will be complied with to the extent practicable, and the OSC intends to comply with EPA's off-site policy for all of the proposed actions. Throughout the project the OSC has maintained a dialog with the Illinois EPA and has requested and received ARARs that have been complied with to the extent practicable.

It is anticipated that no post removal site controls will be needed. Also, the proposed action will not impede any future remedial responses based on the available information.

The response actions described in this memorandum directly addresses actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD THE ACTION BE DELAYED OR NOT TAKEN.

Public health concerns will continue and could result in an increased risk to persons trespassing on the site and to residents of several adjacent campgrounds. The solvent contaminated oil holds a real risk to the adjacent lakes if not properly disposed of and the potential risk to nearby campers from the potentially contaminated surface soils could be substantial.

VII. OUTSTANDING POLICY ISSUES

NONE

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum as part of the November 30, 1992 Action Memorandum.

IV. RECOMMENDATION

This decision document presents the selected removal action for the A. A. Waste Oil Site located in Rock Island, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP.

This decision is based on the administrative record for the site. Conditions at the site continue to meet the NCP Section 300.415 (b) (2) criteria for a removal action and I recommend your approval of this request. The total project ceiling increase, if

approved, will be \$35,000 for a total site ceiling of \$637,000. Of this, an estimated \$540,000 may be used for cleanup contractor costs.

APPROVE:

Wm. E. Myers
Director, Waste Management Division

DATE:

7/18/94

DISAPPROVE:

Director, Waste Management Division

DATE: _____

Attachments

1. Action Memorandum dated November 30, 1994

cc:

Greg Dunn, Illinois EPA
Shelia Huff, U.S. Dept. of the Interior
Terri Johnson, U.S. EPA, OERR, 5202-G